



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

ICR/SKW
F. #2015R01171

*271 Cadman Plaza East
Brooklyn, New York 11201*

August 27, 2021

By Hand, Email and ECF

Kaveh Lotfolah Afrasiabi
Defendant, Pro Se
c/o Deirdre D. von Dornum, Esq.
Standby Counsel
Federal Defenders of New York, Inc.
One Pierrepont Plaza, 16th Floor
Brooklyn, New York 11201

Re: United States v. Kaveh Lotfolah Afrasiabi
Criminal Docket No. 21-46 (ERK)

Dear Dr. Afrasiabi and Ms. von Dornum:

Enclosed please find the government's next production of discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. This discovery is provided subject to the terms of the Court's August 12, 2021 Protective Order (the "August 12, 2021 Protective Order") (See ECF No. 103). The government renews its request for reciprocal discovery from the defendant.

Some of the discovery in this production has been designated "Sensitive Discovery Material" under the August 12, 2021 Protective Order. At the defendant's request, all of the discovery material referenced in this letter is being provided to Ms. von Dornum, the defendant's Court-appointed standby counsel.

Description	Bates Numbers
A redacted copy of the defendant's U.S. Citizenship and Immigration Services certified A-File.	KA0002794-KA0002948
Audio recordings of the defendant.	KA0002949-KA0035743

Description	Bates Numbers
A table reflecting relevant contextual information for the audio recordings produced under Bates numbers KA0002949-KA0035743.	KA0035744
A table reflecting SMS messages sent and received by the defendant.	KA0035745
Records of the Internal Revenue Service regarding the defendant.	KA0035746-KA0035777
Records of Aetna relating to the defendant.	KA0035778-KA0036804
Aetna records relating to the members of the employee benefit plan for Employees of the Permanent Mission of the Islamic Republic of Iran to the United Nations. This discovery has been designated Sensitive Discovery Material under the August 12, 2021 Protective Order.	KA0036805-KA0036816
Records of Cigna relating to the defendant.	KA0036817-KA0036906
Cigna records relating to the members of the employee benefit plan for Employees of the Permanent Mission of the Islamic Republic of Iran to the United Nations. This discovery has been designated Sensitive Discovery Material under the August 12, 2021 Protective Order.	KA0036907
Records of United Healthcare relating to the defendant.	KA0036908-KA0037446

Description	Bates Numbers
United Healthcare records relating to the members of the employee benefit plan for Employees of the Permanent Mission of the Islamic Republic of Iran to the United Nations. This discovery has been designated Sensitive Discovery Material under the August 12, 2021 Protective Order.	KA0037447
Records of Citizens Bank relating to the defendant.	KA0037448-KA0037634
Records of the Federal Reserve Bank of New York relating to the defendant.	KA0037635-KA0037695
Records of JPMorgan Chase Bank relating to the defendant.	KA0037696-KA0038485
Records of Sprint relating to the defendant.	KA0038486-KA0038498
Aetna Certifications	KA0038499-KA0038500
United Healthcare Certifications	KA0038501-KA0038503
Records related to United Nations Federal Credit Union. This discovery has been designated Sensitive Discovery Material under the August 12, 2021 Protective Order.	KA0038501-KA0039016
A search warrant and supporting affidavit to search the defendant's Yahoo email accounts, signed by the Honorable Lois Bloom, dated December 1, 2020. This discovery has been designated Sensitive Discovery Material under the August 12, 2021 Protective Order.	KA0039016-KA0039082
A search warrant and supporting affidavit to search the defendant's residence, signed by the Honorable Judith G. Dein, dated January 15, 2021. This discovery has been designated Sensitive Discovery Material under the August 12, 2021 Protective Order.	KA0039083-KA0039157
A search warrant and supporting affidavit to search the defendant's cellphone, signed by the Honorable Judith G. Dein, dated January 20, 2021. This discovery has been designated Sensitive Discovery Material under the August 12, 2021 Protective Order.	KA0039158-KA0039255

Description	Bates Numbers
A search warrant and supporting affidavit to search property seized from the defendant, signed by the Honorable Judith G. Dein, dated January 27, 2021. This discovery has been designated Sensitive Discovery Material under the August 12, 2021 Protective Order.	KA0039256-KA0039359
A disc containing emails of the defendant.	KA0039360
Records of People's United Bank relating to certain checks.	KA0039361-KA0039391

Please let us know if you have any questions.

Very truly yours,

JACQUELYN M. KASULIS
Acting United States Attorney

By: /s/
Ian C. Richardson
Sara K. Winik
Assistant U.S. Attorneys
(718) 254-7000

Enclosures (KA0002794-KA0039391)

cc: Clerk of the Court (ERK) (by ECF) (without enclosures)